

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE, Individually and
As Next Friend of JULIE DOE, a minor,

Plaintiffs,

v.

MYSPACE, INC., and
NEWS CORPORATION,

Defendants.

No. 06-cv-7880 (MGC/AJP)

**DEFENDANT NEWS CORPORATION'S MEMORANDUM OF LAW
IN SUPPORT OF ITS MOTION TO TRANSFER**

Defendant News Corporation (“*News Corp.*”) submits this Memorandum of Law in Support of its Motion to Transfer, which requests that the Court transfer this case to the United States District Court for the Western District of Texas, Austin Division, pursuant to 28 U.S.C. § 1404(a). News Corp. is filing with this Court contemporaneously, but separately, a motion to dismiss Plaintiffs’ claims.

In support of its motion, News Corp. joins in the motion to transfer filed by Defendant MySpace, Inc. (“*MySpace*”) and adopts the arguments and reasoning presented in Defendant MySpace’s Memorandum of Law in Support of Its Motion to Transfer.

For the reasons stated in MySpace's memorandum, News Corp. respectfully requests that its Motion to Transfer be granted and that this case be transferred to the Western District of Texas pursuant to 28 U.S.C. § 1404(a).

Dated November 8, 2006

Respectfully submitted,

VINSON & ELKINS, L.L.P.

By: Ronald L. Oran Jr.

Clifford Thau (CT 8708)
Ari M. Berman (AB4928)
Hilary L. Preston (HP 7019)
Ronald Oran (RO 3317)
666 Fifth Avenue
26th Floor
New York, NY 10103-0040
(212) 237-0000

Michael D. Marin
Susan Denmon Gusky
Christopher V. Popov
The Terrace 7
2801 Via Fortuna, Suite 100
Austin, Texas 78746
(512) 542-8549
(512) 236-3410 (Facsimile)

Attorneys for News Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of November, 2006, the Memorandum of Law in Support of Motion to Transfer was served upon counsel for all parties via the Court's Electronic Notification System.

Ronald L. Orr Jr.